

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Leila Green Little, *et al.*,

Plaintiffs,

v.

Llano County, *et al.*,

Defendants.

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Civil Action No. 1:22-cv-00424-RP

**DECLARATION OF ELLEN LEONIDA
IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL**

I, Ellen Leonida, declare:

1. I am an attorney at BraunHagey & Borden LLP and counsel of record for Plaintiffs in the above-captioned matter. I make this declaration based on personal knowledge and if called upon to testify, I could and would testify competently to the facts stated herein.

2. On March 31, 2023, I took the deposition of Jonathan Mitchell, counsel for Defendants in this case. Attached as **Exhibit 1** is a true and correct copy of select excerpts and exhibits from the transcript of the deposition of Mr. Mitchell.

3. Attached as **Exhibit 2** is a true and correct copy of an email thread including emails that Plaintiffs' counsel sent to Jonathan Mitchell and received from Jonathan Mitchell on April 14, 2023.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: April 14, 2023

By: /s/ Ellen Leonida
Ellen Leonida